

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Richard Sitcha,
(A95 461 653)

v.

Frederick MacDonald, High Sheriff, Franklin County House of Corrections; Tom Ridge, Secretary, Department of Homeland Security; Michael Garcia, Assistant Secretary (Designee), Bureau of Immigration and Customs Enforcement (ICE); Eduardo Aguire, Acting Director, Bureau of Citizenship and Immigration Services ("CIS"); Bruce Chadbourne, Interim Director, ICE, Boston, Respondents

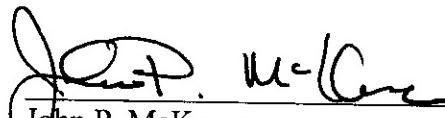
) Case No. 04-CV-30090-MAP

MAILED
FILED
U.S. DISTRICT COURT
MASSACHUSETTS

MOTION TO RELEASE PETITIONER ON BAIL

The Petitioner moves, this court to release the Petitioner on bail with conditions while the Writ of Habeas Corpus is pending. As grounds, please see attached Affidavit and Memorandum.

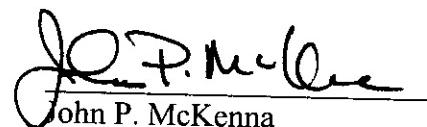
By His Attorney,


John P. McKenna
1537 Main Street, Suite 305
Springfield, MA 01103
413-787-9995
BBO# 630542

Certificate of Service

I hereby certify that I served a copy of the foregoing motion, by hand delivery,
this 9th day of August 2004 on:

Assistant United States Attorney
Karen Goodwin
U.S. Attorney's Office
1550 Main Street, Room 310
Springfield, MA 01103



John P. McKenna
John P. McKenna